

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

LEENA VARUGHESE, M.D.,

Plaintiff,

- against -

MOUNT SINAI MEDICAL CENTER, PATRICK
LENTO, M.D., CARLOS CORDON-CARDO, M.D.,
ADOLFO FIRPO, M.D., IRA J. BLEIWEISS, M.D.
and ABC Corp. 1-10, and JOHN DOES 1-10,

Defendants.

12 Civ. 8812 (CM)

MOTION TO ADJOURN THE INITIAL PRETRIAL CONFERENCE

Pursuant to this Court's December 13, 2012 Order, Defendants Mount Sinai Hospital (named herein as "Mount Sinai Medical Center") ("Mount Sinai"), Patrick Lento, M.D. ("Dr. Lento"), Carlos Cordon-Cardo, M.D. ("Dr. Cordon-Cardo"), Adolfo Firpo, M.D. ("Dr. Firpo"), and Ira J. Bleiweiss, M.D. ("Dr. Bleiweiss") (collectively "Defendants"), hereby move this Court for an adjournment of the initial pretrial conference currently scheduled for February 8, 2013 until a date after Defendants' Motion to Dismiss Plaintiff's Complaint, which will be filed on February 7, 2013, is fully briefed. In support of their motion, Defendants state:

1. On January 8, 2013, this Court granted the request of Defendants Mount Sinai, Dr. Cordon-Cardo, Dr. Firpo, and Dr. Bleiweiss to extend the time for them to answer, move or otherwise respond to the Complaint until February 7, 2013. At the time this request was made, Dr. Lento had not yet been served. Dr. Lento has now been served and Edwards Wildman Palmer LLP has been retained to represent him. Dr. Lento will respond to Plaintiff's Complaint along with the other Defendants on February 7, 2013.

2. On February 7, 2013, Defendants will move to dismiss Plaintiff's Complaint in its entirety.

3. An initial pretrial conference in this matter is scheduled for the next day, February 8, 2013, at 10:45 a.m. Pursuant to this Court's December 13, 2012 Order, Defendants' respectfully request that this conference be adjourned until a date after their motion to dismiss is fully briefed.

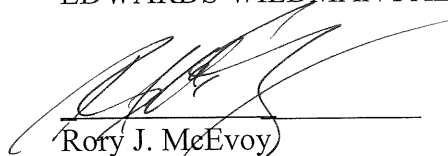
4. This is Defendants' first request to adjourn the initial pretrial conference.

5. Counsel for Plaintiff does not object to this request.

WHEREFORE, Defendants request that the initial pretrial conference scheduled for February 8, 2013 be adjourned until a date after Defendants' Motion to Dismiss Plaintiff's Complaint is fully briefed.

Dated: New York, New York
February 1, 2013

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